

1 FRANK M. PITRE (SBN 100077)
 fpitre@cpmlegal.com
 2 NANCY L. FINEMAN (SBN 124870)
 nfineman@cpmlegal.com
 3 NIKI B. OKCU (SBN 229345)
 nokcu@cpmlegal.com
 4 STUART G. GROSS (SBN 251019)
 sgross@cpmlegal.com
 5 **COTCHETT, PITRE & McCARTHY**
 San Francisco Airport Office Center
 6 840 Malcolm Road, Suite 200
 Burlingame, CA 94010
 7 Telephone: (650) 697-6000

8 *Attorneys for Plaintiffs Steven F. Fitz,*
 9 *John Tarantino, and the Class*

10
 11 **UNITED STATES DISTRICT COURT FOR**
 12 **THE NORTHERN DISTRICT OF CALIFORNIA**

14 **CHELSEA, LLC, MARK RUSSO,**
 15 **ALLEN LORETZ, and IVAN**
 16 **SIMPSON, individually and on**
 17 **behalf of all others similarly**
 18 **situated,**

19 **Plaintiffs,**

20 **v.**

21 **REGAL STONE, LTD., HANJIN**
 22 **SHIPPING, CO., LTD., CONTI**
 23 **CAIRO KG, NSB NEIDERELBE,**
 24 **SYNERGY MARITIME, LTD. In**
 25 **Personam; M/V COSCO BUSAN,**
 26 **their engines, tackle, equipment,**
 27 **appurtenances, freights, and cargo**
 28 **In Rem,,**

Defendants.

CASE NO.: C-07-5800-SC

DECLARATION OF
JOHN TARANTINO IN SUPPORT
OF PLAINTIFFS' *EX PARTE*
MOTION FOR AN ORDER TO
SHOW CAUSE WHY A
PROTECTIVE ORDER TO
SUPERVISE AND LIMIT
COMMUNICATIONS WITH
PUTATIVE CLASS MEMBERS
SHOULD NOT ISSUE

Date: -----

Time: -----

Ctrm: 1, 17th Floor
 Hon. Samuel J. Conti

1 I, JOHN TARANTINO, declare as follows:

2 1. I am a plaintiff in *Tarantino, et al. v. Hanjin Shipping Co., Ltd.*, San
3 Francisco County Superior Court Case No. CGC-07-469379. I have personal
4 knowledge of the following matters, and I can and will competently testify to
5 them.

6 2. I am a commercial Dungeness crab fisherman operating out San
7 Francisco. I have commercially fished for Dungeness crabs in the San Francisco
8 Bay Area for 35 yers.

9 3. Hudson Marine has established a claims process ("Claims Process")
10 whereby Dungeness crab fishermen may seek compensation for some part of their
11 economic losses caused by the M/V Cosco Busan's collision with the Bay Bridge
12 on November 7, 2007 and the resulting oil spill ("Oil Spill").

13 4. I have suffered and continue to suffer economic injuries caused by
14 the Oil Spill.

15 5. On or about December 8, 2006, I spoke by phone with a
16 representative of Hudson Marine named Harry Bolton.

17 6. I informed Mr. Bolton that I am represented by counsel in an action
18 seeking compensation for the economic injuries I have suffered and continue to
19 suffer as a result of the Oil Spill.

20 7. Mr. Bolton, as a representative of Hudson Marine, informed me that
21 because I was represented by counsel he could not speak with me. Mr. Bolton
22 further informed me that I could only participate in the Claims Process if I
23 terminated my representation by counsel.

24 I declare under penalty of perjury under the laws of the State of California
25 that the foregoing is true and correct. Executed this 10 day of January, 2008, at
26 Corte Madera, California.

27 
28 JOHN TARANTINO